

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ASSOCIATION OF AMERICAN
UNIVERSITIES, et al.,

Plaintiffs,

v.

NATIONAL SCIENCE FOUNDATION, et al.,

Defendants.

Case No. 25-cv-11231

MOTION FOR PRO HAC VICE ADMISSION OF ISHAN K. BHABHA

Now comes Shoba Pillay, a member in good standing of the bar of this Court, and moves pursuant to Local Rule 83.5.3 for the admission in this case of Ishan K. Bhabha as counsel for Plaintiffs Association of American Universities, American Council on Education, Association of Public and Land-grant Universities, AZ Board of Regents on Behalf of Arizona State University, Brown University, California Institute of Technology, the Regents of the University of California, Carnegie Mellon University, University of Chicago, Cornell University, Board of Trustees of the University of Illinois, Massachusetts Institute of Technology, Regents of the University of Michigan, Regents of the University of Minnesota, University of Pennsylvania, and Trustees of Princeton University.

Mr. Bhabha is a partner in the law firm of Jenner & Block LLP. He is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice; there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; he has not previously had a pro hac vice admission to this Court (or other admission for a limited purpose under

Local Rule 83.5.3) revoked for misconduct; and he has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Shoba Pillay requests that Mr. Bhabha be granted leave to appear and practice *pro hac vice* on behalf of Plaintiffs in the above-captioned matter.

Dated: May 6, 2025

Respectfully submitted,

ASSOCIATION OF AMERICAN UNIVERSITIES,
AMERICAN COUNCIL ON EDUCATION,
ASSOCIATION OF PUBLIC AND LAND-GRANT
UNIVERSITIES, AZ BOARD OF REGENTS ON
BEHALF OF ARIZONA STATE UNIVERSITY,
BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, THE REGENTS
OF THE UNIVERSITY OF CALIFORNIA,
CARNEGIE MELLON UNIVERSITY,
UNIVERSITY OF CHICAGO, CORNELL
UNIVERSITY, BOARD OF TRUSTEES OF THE
UNIVERSITY OF ILLINOIS, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY, REGENTS OF
THE UNIVERSITY OF MICHIGAN, REGENTS
OF THE UNIVERSITY OF MINNESOTA,
UNIVERSITY OF PENNSYLVANIA, and
TRUSTEES OF PRINCETON UNIVERSITY,

/s/ Shoba Pillay

Shoba Pillay, BBO No. 659739

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Chicago, IL 60654

Tel: (312) 222-9350

SPillay@jenner.com

LOCAL RULE 7.1 CERTIFICATION

As of the date of this filing, it is unknown who will represent the Defendants in this matter. For that reason, counsel have not had an opportunity to confer in an effort to resolve or narrow the issues presented by this motion.

/s/ Shoba Pillay

Shoba Pillay

CERTIFICATE OF SERVICE

I, Shoba Pillay, hereby certify that a true copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 6, 2025.

/s/ Shoba Pillay

Shoba Pillay

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**CERTIFICATION IN SUPPORT OF
MOTION FOR *PRO HAC VICE* ADMISSION**

Pursuant to Local Rule 83.5.3(e)(3) of the Local Rules of the U.S. District Court for the District of Massachusetts, I, Ishan K. Bhabha, hereby certify:

1. I submit this certification in support of Plaintiffs' Motion for *Pro Hac Vice* Admission.
2. I am a partner in the law firm of Jenner & Block LLP and a member of the bars of the District of Columbia and New York.
3. I am a member of the bar in good standing in every jurisdiction in which I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
5. I have not previously had a pro hac vice admission to this Court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct.

6. I have read and agree to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 6, 2025

/s/ Ishan K. Bhabha

Ishan K. Bhabha (D.C. Bar #1015673; NY Bar #4812194)

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